

LAW OFFICES

STRANG, FLETCHER, CARRIGER, WALKER, HODGE, & SMITH, PLLC

CARLOS C. SMITH
WILLIAM C. CARRIGER
RICHARD T. HUDSON
FREDERICK L. HITCHCOCK
EWING STRANG
LARRY L. CASH *
CHRISTINE MABE SCOTT *
J. ROBIN ROGERS # *
G. MICHAEL LUHOWIAK
GREGORY D. WILLETT
MARK W. SMITH *
STEPHEN D. BARHAM

OF COUNSEL

ROBERT KIRK WALKER
MICHAEL A. KENT

400 KRYSTAL BUILDING
ONE UNION SQUARE
CHATTANOOGA, TENNESSEE 37402-2514
TELEPHONE 423-265-2000
FACSIMILE 423-756-5861

November 21, 2003

S. BARTOW STRANG
1882-1954

JOHN S. FLETCHER
1879-1961

JOHN S. CARRIGER
1902-1989

JOHN S. FLETCHER, JR.
1911-1974

ALBERT L. HODGE
1910-1997

F. THORNTON STRANG
1920-1999

*ALSO LICENSED IN GEORGIA
*ALSO LICENSED IN ALABAMA

The Honorable Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505
Attention: Dockets and Records Manager
Sharla Dillon

Re: *Implementation of the Federal Communications Commission's Triennial
Review Order (Nine-month Proceeding) (Switching)*
Docket No. 03-00491

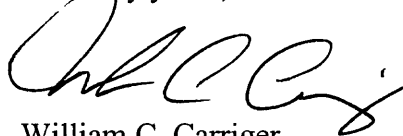
Dear Chairman Tate:

We are enclosing an original of the Electric Power Board of Chattanooga's Response to BellSouth Telecommunications, Inc.'s First Set of Interrogatories together with thirteen copies.

Also, enclosed are an original of the Electric Power Board of Chattanooga's Response to BellSouth Telecommunication, Inc.'s First Request for Production of Documents together with 13 copies.

An additional copy of each pleading is enclosed, which we request be stamped filed and returned to us.

Sincerely yours,



William C. Carriger
For the Firm

WCC:tm
EPB/TEL - #229

Enclosures

cc: Parties of Record

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re: *Implementation of the Federal Communications Commission's Triennial
Review Order (Nine-month Proceeding) (Switching)*
Docket No. 03-00491

ELECTRIC POWER BOARD OF CHATTANOOGA'S
RESPONSE TO BELL SOUTH TELECOMMUNICATIONS, INC.'S
FIRST SET OF INTERROGATORIES

On November 6, 2003, the Electric Power Board of Chattanooga ("EPB") filed its Preliminary Objections to BellSouth's First Set of Interrogatories and First Request for Production of Documents ("Objections"). Any response to any of BellSouth's Interrogatories is made without waiving EPB's Objections and is made subject to EPB's Objections. EPB only has operations in Tennessee and the response to any question shall be construed as only applying to Tennessee.

1. Identify each switch owned by EPB that EPB uses to provide a qualifying service anywhere in Tennessee; irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g., circuit switch, packet switch, soft switch, host switch, remote switch).

RESPONSE: Nortel DNS500.

2. For each switch identified in response to Interrogatory No. 1, please:
- a) provide the Common Language Location Identifier ("CLLI") code of the switch;
 - b) provide the street address, including the city and state in which the switch is located;
 - c) identify the type of switch by manufacturer and model (e.g., Nortel DMS100);

- d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts;
- f) and provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG"); or, state if the switch is not identified in the LERG.

RESPONSE:

- a) CHTGTN48DS0
- b) 110 N. Greenwood Avenue, Chattanooga, TN 37404
- c) Nortel DMS 500 Supernode
- d) 30,180
- e) Information will be filed subject to the Protective Order
- f)

<u>State</u>	<u>NPA-NXX</u>	<u>OCN</u>
TN	423-648 423-643	4645

<u>Company</u>	<u>Rate Center</u>
Electric Power Board of Chattanooga	Chattanooga

<u>Switch</u>	<u>Usage</u>
CHTGTN48DS0	AS

- 3. Identify any other switch not previously identified in Interrogatory No. 1

that EPB uses to provide a qualifying service anywhere in Tennessee, irrespective of whether the switch itself is located in the State and regardless of the type of switch (e.g.,

circuit switch, packet switch, soft switch, host switch, remote switch). In answering this Interrogatory, do not include ILEC switches used by EPB either on an unbundled or resale basis.

RESPONSE: None

4. For each switch identified in response to Interrogatory No. 3, please:
 - a) identify the person that owns the switch;
 - b) provide the Common Language Location Identifier ("CLLI") code of the switch;
 - c) provide the street address, including the city and state in which the switch is located;
 - d) identify the type of switch by manufacturer- and model (e.g., Nortel DMS100);
 - e) describe in detail the arrangement by which you are making use of the switch, including stating whether you are leasing the switch or switching capacity on the switch;
 - f) identify all documents referring or relating to the rates, terms, and conditions of EPB's use of the switch; and
 - g) provide information relating to the switch as contained in Telcordia's Local Exchange Routing Guide ("LERG"); or, state if the switch is not identified in the LERG.

RESPONSE: Not Applicable.

5. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any

end user customers in Tennessee utilizing any of the switches identified in response to Interrogatory No. 1. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

RESPONSE:

	<u>CLLI</u>		<u>CLLI</u>
Brainerd C/O 505 Airport Road Chattanooga, TN 37421	CTGTNBR	Dodds C/O 2605 Duncan Avenue Chattanooga, TN 37404	CTGTNDT
Cleveland C/O 549 Broad Street, NW Cleveland, TN 37311	CLEVTNMA	Hixson/Red Bank C/O 105 W Leawood Avenue Chattanooga, TN 37415	CTGTNRB
MLK-NS C/O 300 E. M L King Blvd. Chattanooga, TN 37403	CTGTNNS	Hixson/Middle Valley C/O 1710 Crabtree Road Hixson, TN 37343	CTGTNMV
Signal Mountain C/O 802 Kentucky Avenue Signal Mountain, TN 37377	CTGTNSM	Jasper C/O 203 Academy Avenue Jasper, TN 37347	JSPRTNMT
Soddy-Daisy C/O 10360 Walden Street Soddy-Daisy, TN 37379	SDDSTNMA	St. Elmo C/O 4608 St. Elmo Avenue Chattanooga, TN 37409	CTGTNSE
Rossville C/O 822 Chickamauga Avenue Chattanooga, TN 37407	CTGTNRO	Harrison C/O 6222 Highway 58 Harrison, TN 37341	CTGTNHT

6. For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory 1.

RESPONSE: Information will be filed subject to the Protective Order.

7. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 6, separate the lines by end user and end user location in the following manner:

- a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;
- f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;

- l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

RESPONSE: Information will be filed subject to the Protective Order.

8. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Tennessee utilizing any of the switches identified in response to Interrogatory No. 3. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user is located.

RESPONSE: Not Applicable.

9. For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area from the switches identified in response to Interrogatory No. 3.

RESPONSE: Not applicable.

10. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 9, separate the lines by end user and end user location in the following manner:

- a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;

- b) The number of end user customers to whom you provide two (2) voicegrade equivalent lines;
- c) The number of end user customers to whom you provide three (3) voicegrade equivalent lines;
- d) The number of end user customers to whom you provide four (4) voice grade equivalent lines;
- e) The number of end user customers to whom you provide five (5) voicegrade equivalent lines;
- f) The number of end user customers to whom you provide six (6) voice grade equivalent lines;
- g) The number of end user customers to whom you provide seven (7) voicegrade equivalent lines;
- h) The number of end user customers to whom you provide eight (8) voicegrade equivalent lines;
- i) The number of end user customers to whom you provide nine (9) voicegrade equivalent lines;
- j) The number of end user customers to whom you provide ten (10) voicegrade equivalent lines;
- k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and

- m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

RESPONSE: Not applicable.

11. Identify by name, address, and CLLI code each ILEC wire center area, i.e., the territory served by the wire center, in which you provide qualifying service to any end user customers in Tennessee using an ILEC's switch either on an unbundled or resale basis. If you assert that you cannot identify or do not know how to ascertain the boundaries of a wire center area, provide the requested information for the ILEC exchange in which your end user customer is located.

RESPONSE:

	<u>CLLI</u>		<u>CLLI</u>
Brainerd C/O 505 Airport Road Chattanooga, TN 37421	CTGTNBR	Dodds C/O 2605 Duncan Avenue Chattanooga, TN 37404	CTGTNDT
Cleveland C/O 549 Broad Street, NW Cleveland, TN 37311	CLEVTNMA	Hixson/Red Bank C/O 105 W Leawood Avenue Chattanooga, TN 37415	CTGTNRB
MLK-NS C/O 300 E. M L King Blvd. Chattanooga, TN 37403	CTGTNNS	Hixson/Middle Valley C/O 1710 Crabtree Road Hixson, TN 37343	CTGTNMV
Signal Mountain C/O 802 Kentucky Avenue Signal Mountain, TN 37377	CTGTNSM	Jasper C/O 203 Academy Avenue Jasper, TN 37347	JSPRTNMT
Soddy-Daisy C/O 10360 Walden Street Soddy-Daisy, TN 37379	SDDSTNMA	St. Elmo C/O 4608 St. Elmo Avenue Chattanooga, TN 37409	CTGTNSE
Rossville C/O 822 Chickamauga Avenue Chattanooga, TN 37407	CTGTNRO	Dayton C/O 116 S. Railroad Street Dayton, TN 37321	DYTNTNMA

	CLLI		CLLI
Harrison C/O 6222 Highway 58 Harrison, TN 37341	CTGTNHT	South Pittsburg C/O 105 Fourth Street South Pittsburg, TN 37380	SPBGTNMA
Decatur C/O 7535 Highway 30 Decatur, TN 37322	DCTRTNMT	Whitwell C/O 132 E. Spring Street Whitwell, TN 37379	WHWLTNMA

12. For each ILEC wire center area identified in the foregoing Interrogatory (or ILEC exchange if you do not provide the information by wire center area) identify the total number of voice-grade equivalent lines you are providing to end user customers in that wire center area using an ILEC's switch either on an unbundled or resale basis.

RESPONSE: Information will be filed subject to the Protective Order.

13. With regard to the voice-grade equivalent lines identified by ILEC wire center area (or ILEC exchange) in response to Interrogatory 12, separate the lines by end user and end user location in the following manner:

- a) The number of end user customers to whom you provide one (1) voice-grade equivalent line;
- b) The number of end user customers to whom you provide two (2) voice-grade equivalent lines;
- c) The number of end user customers to whom you provide three (3) voice-grade equivalent lines;
- d) The number of end user customers to whom you provide four (4) voice-grade equivalent lines;
- e) The number of end user customers to whom you provide five (5) voice-grade equivalent lines;

- f) The number of end user customers to whom you provide six (6) voice-grade equivalent lines;
- g) The number of end user customers to whom you provide seven (7) voice-grade equivalent lines;
- h) The number of end user customers to whom you provide eight (8) voice-grade equivalent lines;
- i) The number of end user customers to whom you provide nine (9) voice-grade equivalent lines;
- j) The number of end user customers to whom you provide ten (10) voice-grade equivalent lines;
- k) The number of end user customers to whom you provide eleven (11) voice-grade equivalent lines;
- l) The number of end user customers to whom you provide twelve (12) voice-grade equivalent lines; and
- m) The number of end user customers to whom you provide more than twelve (12) voice-grade equivalent lines;

RESPONSE: Information will be filed subject to the Protective Order.

14. Do you offer to provide or do you provide switching capacity to another local exchange carrier for its use in providing qualifying service anywhere in the nine states in the BellSouth region. If the answer to this Interrogatory is in the affirmative, for each switch that you use to offer or provide such switching capacity, please:

- a) Provide the Common Language Location Identifier ("CLLI") code of the switch;

- b) Provide the street address, including the city and state in which the switch is located;
- c) Identify the type of switch by manufacturer and model (e.g., Nortel DMS100);
- d) State the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of serving, based on the switch's existing configuration and component parts;
- e) State the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- f) Identify all documents referring or relating to the rates, terms, and conditions of EPB's provision of switching capability.

RESPONSE: No.

15. Identify every business case in your possession, custody or control that evaluates, discusses, analyzes or otherwise refers or relates to the offering of a qualifying service using: (1) the Unbundled Network Element Platform (UNE-P), (2) self-provisioned switching, (3) switching obtained from a third party provider other than an ILEC, or (4) any combination of these items.

RESPONSE: See EPB's Objections.

16. Identify any documents that you have provided to any of your employees or agents, or to any financial analyst, bank or other financial institution, shareholder or any other person that describes, presents, evaluates or otherwise discusses in whole or

part, how you intend to offer or provide local exchange service, including but not limited to such things as the markets in which you either do participate or intend to participate, the costs of providing such service, the market share you anticipate obtaining in each market, the time horizon over which you anticipate obtaining such market share, and the average revenues you expect per customer.

RESPONSE: See EPB's Objections.

17. If not identified in response to a prior Interrogatory, identify every document in your possession, custody, or control referring or relating to the financial viability of self-provisioning switching in your providing qualifying services to end user customers.

RESPONSE: See EPB's Objections.

18. Do you have switches that are technically capable of providing, but are not presently being used to provide, a qualifying service in Tennessee? If the answer to this Interrogatory is in the affirmative, please:

- a) provide the Common Language Location Identifier ("CLLI") code of the switch;
- b) provide the street address, including the city and state in which the switch is located;
- c) identify the type of switch by manufacturer and model e. , Nortel DMS100);
- d) state the total capacity of the switch by providing the maximum number of voice-grade equivalent lines the switch is capable of

serving, based on the switch's existing configuration and component parts;

- e) state the number of voice-grade equivalent lines the switch is currently serving based on the switch's existing configuration and component parts; and
- f) identify any documents in your possession, custody or control that discuss, evaluate, analyze or otherwise refer or relate to whether those switches could be used to provide a qualifying service in Tennessee.

RESPONSE: No

19. Identify each MSA in Tennessee where you are currently offering a qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

RESPONSE: Chattanooga.

20. If you offer a qualifying service outside of the MSAs identified in response to Interrogatory 19, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

RESPONSE: Not Applicable.

21. Describe with particularity the qualifying services that you offer in the geographic areas described in response to Interrogatories 19 and 20, including the rates, terms, and conditions under which such services are offered. If the qualifying services

you offer in those areas vary by area, provide a separate statement of services offered and the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

RESPONSE: See EPB's Objections.

22. Identify each MSA in Tennessee where you are currently offering a non-qualifying service without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

RESPONSE: Chattanooga.

23. If you offer a non-qualifying service outside of the MSAs identified in response to Interrogatory 22, identify those geographic areas either by describing those areas in words or by providing maps depicting the geographic areas in which you offer such service, without regard to whether you are offering the service using your own facilities, UNE-P, resale, or in some other fashion.

RESPONSE: Not Applicable.

24. Describe with particularity the non-qualifying services that you offer in the geographic areas described in response to Interrogatories 22 and 23, including the rates, terms, and conditions under which such services are offered. If the non-qualifying services you offer in those areas vary by area, provide a separate statement of services

offered and ' the rates, terms, and conditions for such services in each area. If this information is contained on a publicly available web site that clearly identifies the relevant geographic areas and identifies the relevant rates, terms and conditions for such areas, it will be a sufficient answer to identify that web site. It will not be a sufficient response if the web site requires the provision of a telephone number or series of telephone numbers in order to identify the geographic area in which you provide such service, or the rates, terms and conditions upon which service is provided.

RESPONSE: See EPB's Objections.

25. Please state the total number of end users customers in the State of Tennessee to whom you only provide qualifying service.

RESPONSE: See EPB's Objections.

26. For those end user customers to whom you only provide qualifying service in the State of Tennessee, please state the average monthly revenues you receive from each such end user customer.

RESPONSE: See EPB's Objections.

27. For those end user customers to whom you only provide qualifying service in the State of Tennessee, please state the average number of lines that you provide each such end user customer.

RESPONSE: See EPB's Objections.

28. Please state the total number of end users customers in the State of Tennessee to whom you only provide non-qualifying service.

RESPONSE: See EPB's Objections.

29. For those end user customers to whom you only provide non-qualifying service in the State of Tennessee, please state the average monthly revenues you receive from each such end user customer.

RESPONSE: See EPB's Objections.

30. Please state the total number of end users customers in the State of Tennessee to whom you provide both qualifying and non-qualifying service.

RESPONSE: See EPB's Objections.

31. For those end user customers to whom you provide qualifying and non-qualifying service in the State of Tennessee, please state the average monthly revenues you receive from each such end user customer.

RESPONSE: See EPB's Objections.

32. For those end user customers, to whom you provide qualifying and non-qualifying service in the State of Tennessee, please state the average number of lines that you provide each such end user customer.

RESPONSE: See EPB's Objections.

33. Please provide a breakdown of the total number of end user customers served by EPB in Tennessee by class or type of end user customers (e.g., residential customers, small business customers, mass market customers, enterprise customers, or whatever type of classification that you use to classify your customers. For each such classification, and/or if you provide another type of classification, define and describe with specificity the classification so that it can be determined what kinds of customers you have in each classification).

RESPONSE: Information will be filed subject to the Protective Order.

34. For each class or type of end user customer referenced in Interrogatory No. 33, please state the average acquisition cost for each such end user class or type. Please provide this information for each month from January 2000 to the present.

RESPONSE: See EPB's Objections.

35. For each class or type of end user customer referenced in Interrogatory No. 33, please state the typical churn rate for each such end user class or type. Please provide this information for each month from January 2000 to the present.

RESPONSE: Information will be filed subject to the Protective Order.

36. For each class or type of end user customer referenced in Interrogatory No. 33, please state the share of the local exchange market you have obtained. Please provide this information for each month from January 2000 to the present.

RESPONSE: See EPB's Objections.

37. Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to your cumulative market share of the local exchange market in Tennessee.

RESPONSE: See EPB's Objections.

38. Identify any documents in your possession, custody or control that evaluate, discuss or otherwise refer or relate to any projections that you have made regarding your cumulative market share growth in the local exchange market in Tennessee.

RESPONSE: See EPB's Objections.

39. Describe how the marketing organization that is responsible, for marketing qualifying service in Tennessee is organized, including the organization's structure, size

in terms of full time or equivalent employees including contract and temporary employees, and the physical work locations for such employees. In answering this Interrogatory, please state whether you utilize authorized sales representatives in your marketing efforts in Tennessee, and, if so, describe with particularity the nature, extent, and rates, terms, and conditions of such use.

RESPONSE: Information will be filed subject to the Protective Order.

40. How do you determine whether you will serve an individual customer's location with multiple DSOs or whether you are going to use a DS1 or larger transmission system? Provide a detailed description of the analysis you would undertake to resolve this issue, and identify the factors that you would consider in making this type of a decision.

RESPONSE: See EPB's Objections.

41. Is there a typical or average number of DSOs at which you would chose to serve a particular customer with a DS1 or larger transmission system, all other things being equal? If so, please provide that typical or average number and explain how this number was derived.

RESPONSE: See EPB's Objections.

42. What additional equipment, if any, would be required (on the customer's side of the demarcation point rather than on network side of the demarcation point) to provide service to a customer with a DS1 rather than multiple DSOs? For instance, if a customer had 10 DSOs, and you want to provide the customer with the same functionality using a DS1, would a D-4 channel bank, or a digital PBX be required in order to provide equivalent service to the end user that has 10 DSOs? If so, please

provide the average cost of the equipment that would be required to provide that functional equivalency (that is, the channel bank, or the PBX or whatever would typically be required should you decide to serve the customer with a DS1 rather than multiple DSOs.)

RESPONSE: Information will be filed subject to the Protective Order.

43. What cost of capital do you use in evaluating whether to offer a qualifying service in a particular geographic market and how is that cost of capital determined?

RESPONSE: EPB has not made any evaluation of expanding into another geographic market.

44. With regard to the cost of capital you use in evaluating whether to provide a qualifying service in a particular geographic market, what are the individual components of that cost of capital, such as the debt-equity ratio, the cost of debt and the cost of equity?

RESPONSE: See Response to 43.

45. In determining whether to offer a qualifying service in a particular geographic market, what time period do you typically use to evaluate that offer? That is, do you use one year, five years, ten years or some other time horizon over, which you evaluate the project?

RESPONSE: See Response to 43.

46. Provide your definition of sales expense as that term is used in your business.

RESPONSE: Payroll and benefits plus advertising, collateral material and other direct expenses such as, telephone and miscellaneous expense.

47. Based on the definition of sales expense in the foregoing Interrogatory, please state how you estimate sales expense when evaluating whether to offer a qualifying service in a particular geographic market?

RESPONSE: See Response to 43.

48. Provide your definition of general and administrative (G&A) costs as you use those terms in your business.

RESPONSE: Executive payroll and benefits plus consultant, legal, building occupancy, liability insurance, cost of administrative services provided by electric system and in lieu of taxes.

49. Based on the definition of G&A costs in the foregoing Interrogatory, please state how you estimate G&A expenses when evaluating whether to offer a qualifying service in a particular geographic market?

RESPONSE: See Response to 43.

50. For each day since January 1, 2000, identify the number of individual hot cuts that BellSouth has performed for EPB in each state in BellSouth's region.

RESPONSE: See EPB's Objections.

51. For each individual hot cut identified in response to Interrogatory No. 50, state:

- a) Whether the hot cut was coordinated or not;
- b) If coordinated, whether the hot cut occurred as scheduled;
- c) If the hot cut did not occur as scheduled, state whether this was due to a problem with BellSouth, EPB, the end-user customer, or some

third party, and describe with specificity the reason the hot cut did not occur as scheduled;

- d) If there was a problem with the hot cut, state whether EPB complained in writing to BellSouth or anyone else.

RESPONSE: See EPB's Objections.

52. Does EPB have a preferred process for performing batch hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

RESPONSE: See EPB's Objections.

53. Does EPB have a preferred process for performing individual hot cuts? If the answer to this Interrogatory is in the affirmative, please describe this process with particularity and identify all documents that discuss, describe, or otherwise refer or relate to this preferred process.

RESPONSE: See EPB's Objections.

54. State whether EPB agrees that, it jointly developed BellSouth's process for individual hot cuts with BellSouth as set forth in the parties' April 16, 2001 Memorandum of Understanding. If EPB does not agree, explain why and explain EPB's view of its involvement in the development of that process.

RESPONSE: See EPB's Objections.

55. If EPB has a preferred process for individual hot cuts that differs from BellSouth's process, identify each specific step in EPB's process that differs from BellSouth's process.

RESPONSE: See EPB's Objections.

56. If EPB has a preferred process for bulk hot cuts that differs from BellSouth's process, identify each specific step in EPB's process that differs from BellSouth's process.

RESPONSE: See EPB's Objections.

57. Does EPB have any estimates of what a typical individual hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

RESPONSE: No.

58. Does EPB have any estimates of what a typical bulk hot cut should cost? If the answer to this Interrogatory is in the affirmative, please provide that estimate, describe with particularity how that estimate was calculated, and identify all documents referring or relating to such estimates.

RESPONSE: No.

59. What is the largest number of individual hot cuts that EPB has requested in any individual central office in each of the nine BellSouth states on a single day? In answering this Interrogatory, identify the central office for which the request was made, and the number of hot cuts that were requested. State with specificity what the outcome was for each of the hot cuts in each of the central offices so described, if not provided in response to an earlier interrogatory.

RESPONSE: See EPB's Objections.

60. Does any ILEC in the BellSouth region have a batch hot cut process that is acceptable to EPB or that EPB believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

RESPONSE: See EPB's Objections.

61. Does any ILEC in the BellSouth region have a cost for a batch hot cut process that is acceptable to EPB? If so, name the ILEC and provide the rate and the source of the rate.

RESPONSE: See EPB's Objections.

62. Does any ILEC in the BellSouth region have an individual hot cut process that is acceptable to EPB or that EPB believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

RESPONSE: See EPB's Objections.

63. Does any ILEC in the BellSouth region have a rate for an individual hot cut process that is acceptable to EPB? If so, name the ILEC and provide the rate and the source of the rate.

RESPONSE: See EPB's Objections.

64. Does any ILEC outside the BellSouth region have a batch hot cut process that is acceptable to EPB or that EPB believes is superior to BellSouth's batch hot cut process? If so, identify the ILEC and describe with particularity the ILEC's batch hot cut

process, specifying any differences between the ILEC's batch hot cut process and BellSouth's.

RESPONSE: See EPB's Objections.

65. Does any ILEC outside the BellSouth region have a rate for a batch hot cut process that is acceptable to EPB? If so, name the ILEC and provide the rate and the source of the rate.

RESPONSE: See EPB's Objections.

66. Does any ILEC outside the BellSouth region have an individual hot cut process that is acceptable to EPB or that EPB believes is superior to BellSouth's individual hot cut process? If so, identify the ILEC and describe with particularity the ILEC's individual hot cut process, specifying any differences between the ILEC's individual hot cut process and BellSouth's.

RESPONSE: See EPB's Objections.

67. Does any ILEC outside the BellSouth region have a rate-for an individual hot cut process that is acceptable to EPB? If so, name the ILEC and provide the rate and the source of the rate.

RESPONSE: See EPB's Objections.

68. Does EPB order coordinated or non-coordinated hot cuts?

RESPONSE: See EPB's Objections.

69. Does EPB use the CFA database?

RESPONSE: No.

70. Identify every issue related to BellSouth's hot cut process raised by EPB at the Tennessee CLEC collaborative since October 2001.

RESPONSE: None.

71. What is the appropriate volume of loops that you contend the Tennessee Regulatory Authority ("TRA") should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE: See EPB's Objections.

72. What is the appropriate process that you contend the TRA should use in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE: See EPB's Objections.

73. If EPB disagrees with BellSouth's individual hot cut process, identify every step that EPB contends is unnecessary and state with specificity why the step is unnecessary.

RESPONSE: See EPB's Objections.

74. If EPB disagrees with BellSouth's bulk hot cut process, identify every step that EPB contends is unnecessary and state with specificity why the step is unnecessary.

RESPONSE: See EPB's Objections.

75. Identify by date, author and recipient every written complaint EPB has made to BellSouth regarding BellSouth's hot cut process since October 2001.

RESPONSE: EPB has been unable to locate a written Complaint.

76. How many unbundled loops does EPB contend BellSouth must provision per state per month to constitute sufficient volume to assess BellSouth's hot cut process?

RESPONSE: See EPB's Objections.

77. What is the appropriate information that you contend the TRA should consider in evaluating whether the ILEC is capable of migrating multiple lines served using unbundled local circuit switching to switches operated by a carrier other than the ILEC in a timely manner in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE: See EPB's Objections.

78. What is the average completion interval metric for provision of high volumes of loops that you contend the TRA should require in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE: See EPB's Objections.

79. What are the rates that you contend the TRA should adopt in establishing a batch hot cut process consistent with FCC Rule 51.319(d)(2)(ii)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE: See EPB's Objections.

80. What are the appropriate product market(s) that you contend the TRA should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE: See EPB's Objections.

81. What, are the appropriate geographic market(s) that you contend the TRA should use in implementing FCC Rule 51.319(d)(2)(i)? In answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE: See EPB's Objections.

82. Do you contend that there are operational barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(2) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such operational barrier, and state all facts and identify all documents supporting your contention.

RESPONSE: See EPB's Objections.

83. Do you contend that there are economic barriers within the meaning of FCC Rule 51.319(d)(2)(iii)(B)(3) that would support a finding that requesting telecommunications carriers are impaired without access to local circuit switching on an unbundled basis in a particular market? If the answer to this Interrogatory is in the affirmative, describe with particularity each such economic barrier, and state all facts and identify all documents supporting your contention.

RESPONSE: See EPB's Objections.

84. What is the maximum number of DSO loops for each geographic market that you contend requesting telecommunications carriers can serve through unbundled switching when serving multiline end users at a single location that the TRA should consider in establishing "cutoff" consistent with FCC Rule 51.319(d)(2)(iii)(B)(4)? In

answering this Interrogatory, please state all facts and identify all documents supporting this contention.

RESPONSE: See EPB's Objections.

ELECTRIC POWER BOARD OF CHATTANOOGA

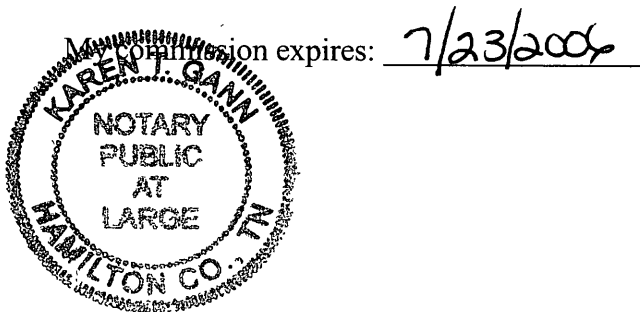
By: *Larry Hinds*
Larry Hinds, Senior Manager
536 Market Street
Chattanooga, Tennessee 37402
(423) 648-1500

STATE OF TENNESSEE:
COUNTY OF HAMILTON:

Before me, the undersigned, a notary public within and for said county and state at Chattanooga, Tennessee, duly commissioned and qualified, personally appeared Larry Hinds, with whom I am personally acquainted, and who, upon his oath, acknowledged himself to be the Senior Manager of the Electric Power Board of Chattanooga, the within named bargainor; and he as such Senior Manager, being duly authorized so to do, executed the foregoing instrument for the purposes therein contained, by subscribing thereto the name of the corporation by himself as Senior Manager.

WITNESS my hand and notarial seal at my office in Chattanooga, Tennessee, this 21st day of November, 2003.

Karen T. Gann
Notary Public



Respectfully submitted,

STRANG, FLETCHER, CARRIGER,
WALKER, HODGE & SMITH, PLLC

By:

A handwritten signature in black ink, appearing to read 'Carlos C. Smith', written over a horizontal line.

Carlos C. Smith (BPR #1710)

William C. Carriger (BPR #1778)

Mark W. Smith (BPR #16908)

Attorneys for Electric Power Board of Chattanooga

400 Krystal Building, One Union Square

Chattanooga, Tennessee 37402

(423) 265-2000

CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2003, the foregoing document was served on
the parties of record, via the method indicated:

<input type="checkbox"/>	Hand	Henry Walker, Esquire
<input checked="" type="checkbox"/>	Mail	Boult, Cummings, <i>et al.</i>
<input type="checkbox"/>	Facsimile	414 Union Street, #1600
<input type="checkbox"/>	Overnight	Nashville, TN 37219-8062
<input type="checkbox"/>	Electronic	hwalker@boultcummings.com

<input type="checkbox"/>	Hand	Charles B. Welch, Esquire
<input checked="" type="checkbox"/>	Mail	Farris, Mathews, <i>et al.</i>
<input type="checkbox"/>	Facsimile	618 Church Street, #300
<input type="checkbox"/>	Overnight	Nashville, TN 37219
<input type="checkbox"/>	Electronic	cwelch@farrismathews.com

<input type="checkbox"/>	Hand	Martha M. Ross-Bain, Esquire
<input checked="" type="checkbox"/>	Mail	AT&T
<input type="checkbox"/>	Facsimile	1200 Peachtree Street, Suite 8100
<input type="checkbox"/>	Overnight	Atlanta, GA 30309
<input type="checkbox"/>	Electronic	rossbain@att.com

<input type="checkbox"/>	Hand	Timothy Phillips, Esquire
<input checked="" type="checkbox"/>	Mail	Office of Tennessee Attorney General
<input type="checkbox"/>	Facsimile	P. O. Box 20207
<input type="checkbox"/>	Overnight	Nashville, TN 37202
<input type="checkbox"/>	Electronic	timothy.phillips@state.tn.us

<input type="checkbox"/>	Hand	H. LaDon Baltimore, Esquire
<input checked="" type="checkbox"/>	Mail	Farrar & Bates
<input type="checkbox"/>	Facsimile	211 Seventh Avenue, North, #320
<input type="checkbox"/>	Overnight	Nashville, TN 37219-1823
<input type="checkbox"/>	Electronic	don.baltimore@farrar-bates.com

<input type="checkbox"/>	Hand	James Wright, Esquire
<input checked="" type="checkbox"/>	Mail	United Telephone – Southeast
<input type="checkbox"/>	Facsimile	14111 Capitol Blvd.
<input type="checkbox"/>	Overnight	Wake Forest, NC 27587
<input type="checkbox"/>	Electronic	james.b.wright@mail.sprint.com

<input type="checkbox"/>	Hand	Guy M. Hicks, Esquire
<input checked="" type="checkbox"/>	Mail	BellSouth
<input type="checkbox"/>	Facsimile	333 Commerce Street, Suite 210
<input type="checkbox"/>	Overnight	Nashville, TN 37201-3300
<input type="checkbox"/>	Electronic	guy.hicks@bellsouth.com

[] Hand
[✓] Mail
[] Facsimile
[] Overnight
[] Electronic

Ms. Carol Kuhnow
Owest Communications, Inc.
4250 North Fairfax Drive
Arlington, VA 33303
Carol.kuhnow@gwest.com

[] Hand
[✓] Mail
[] Facsimile
[] Overnight
[] Electronic

Jon E. Hastings, Esquire
Boult, Cummings, *et al.*
P. O. Box 198062
Nashville, TN 37219-8062
jhastings@boultcummings.com

[] Hand
[✓] Mail
[] Facsimile
[] Overnight
[] Electronic

Dale Grimes, Esquire
Bass, Berry & Sims
315 Deaderick Street, #2700
Nashville, TN 37238-3001
dgrimes@bassberry.com

[] Hand
[✓] Mail
[] Facsimile
[] Overnight
[] Electronic

Nanette S. Edwards, Esquire
ITC^DeltaCom
4092 South Memorial Parkway
Huntsville, AL 35802
nedwards@deltacom.com

[] Hand
[✓] Mail
[] Facsimile
[] Overnight
[] Electronic

Guilford Thornton, Esquire
Stokes & Bartholomew
424 Church Street, #2800
Nashville, TN 37219
gthornton@stokesbrtholomew.com


For: STRANG, FLETCHER, CARRIGER,
WALKER, HODGE & SMITH, PLLC